REMARKS

Claims 1-17 are pending in this application. Claims 1, 2, 4, 5, and 7- 11, are amended to more distinctly claim the present invention. Claim 18 is canceled herein. Applicant submits that no new matter has been added by this response.

SUBSTANCE OF INTERVIEW

As a preliminary matter, Applicant gratefully acknowledges the courtesies extended by the Examiner in the January 16, 2007, telephone interview with Applicant's representative, Vernon R. Yancy. Pursuant to M.P.E.P. § 713.04, Applicant provides the following remarks.

In discussion of the current Office Action, Applicant's understanding of the cited art was explained to the Examiner. Independent claims 1 and 10 were discussed with regard to the Yamashita and Smith patents. Applicant's position on these references was essentially the same as that set forth below.

The Examiner acknowledged Applicant's position concerning the novelty of reconfiguring a complex intersection, and agreed that Applicants position would be considered in the examination of this response.

Claim Objections

Claim 9 was objected to because of informalities: "provides" should be "provided." In response, claim 9 has been amended to corrected the informalities. Accordingly, Applicant requests that the objection is withdrawn.

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Rejections under 35 U.S.C. § 102

Claims 1, 3-4, 7-8, 10, 12-13 and 16-17 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No.: 6,424,911, to Yamashita et al. (hereinafter as "Yamashita").

A proper rejection for anticipation under § 102 requires complete identity of invention. The claimed invention, including each element thereof as recited in the claims, must be disclosed or embodied, either expressly or inherently, in a single reference. Scripps Clinic & Research Found. v. Genentech Inc., 927 F.2d 1565, 1576, 18 U.S.P.Q.2d 1001, 1010 (Fed. Cir. 1991); Standard Havens Prods., Inc. v. Gencor Indus., Inc., 953 F.2d 1360, 1369, 21 U.S.P.Q.2d 1321, 1328 (Fed. Cir. 1991).

Applicant submits that Yamashita does not teach the same combination of elements as presented in claims 1-17. The invention defined by claims 1-17 is directed to a vehicle navigation system and method for accurately guiding the path of the complex intersection by reconfiguring a complex intersection which cannot be represented with one node on the navigation numeric map. The vehicle navigation method according to the claimed invention comprises generating a node and a link sequence from a path searching data, extracting a terminal sharing node and link by comparing the node and link sequence with a map for terminal, reconstructing a path guidance data of the complex intersection based on the extracted sharing node and link, performing a map matching and a path following in a drive state on the basis of the reconstructed data, and providing the followed path guidance information.

Yamashita does not teach a similar method or apparatus including all of the elements recited in claims 1 and 10. Yamashita discloses an intersection display

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method including an intersection shape generation part 5 for receiving route information from a route search part 3 and reading map data in the area near the route from a map data storage part 2. Also, disclosed is an intersection shape generation part 5 for extracting one intersection (intersection node) existing on the route from the read map data, and extracting road links connected to the extracted intersection (See Column 14, lines 1-7).

However, Yamashita does not teach or suggest at least the recited features of <u>**extracting a terminal sharing node and link by comparing the node and link sequence with a map for terminal**</u>, <u>reconstructing a path guidance data of the</u> <u>"complex intersection"</u> based on **the extracted sharing node and link**, as in the claimed invention. Rather, the intersection shape generation part disclosed by Yamashita extracts one intersection (intersection node) existing on the route from the read map data, and extracts road links connected to the extracted intersection (See Column 14). Therefore, the Yamashita reference is not capable of accurately guiding the path of the complex intersection by extracting a terminal sharing node and link by comparing the node and link sequence with a map for terminal, reconstructing a path guidance data of the complex intersection based on the extracted sharing node and link, and performing a map matching and a path following in a drive state on the basis of the reconstructed data, as in the claimed invention.

Furthermore, a complex intersection is disclosed in amended claims 1 and 10 <u>as an intersection having a plurality of nodes</u>. Paragraph [0048] of the application recites, "a typical type of complex intersection is a crossroad intersection (i.e., a radial intersection) including a small-sized ramp for a right turn. Meanwhile, an intersection

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configured with three or more connection links at one node is defined as a simple intersection." The present invention is directed to a navigation system and method for guiding path of a complex intersection. In contrast to the present invention, Yamashita FIGS. 1a, 1b, 4, 6, 8, 10, 12, 15, 16 and 18 illustrate intersection shape generation for simple intersections having only one node.

Applicant submits that Yamashita does not teach or suggest the combination of elements disclosed in claims 1 and 10 of the present invention. Accordingly, claims 1 and 10 are not anticipated by Yamashita and the claims are therefore allowable. Since independent claims 1 and 10 are allowable, Applicant believes that claims 2-9 and 11-17 are also allowable because they depend from allowable independent claims.

Rejections under 35 U.S.C. § 103

Claims 2, 9, 11, and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Yamashita in view of U.S. Patent Application No. 6,184,823 to Smith et al. (hereinafter Smith). The Examiner asserts that smith discloses a geographic database architecture for representation of named intersections and complex intersection and methods of formation thereof and use in a navigation application program. The Examiner further asserts that in regards to claims 2, 9 and 11, that Smith supplies the deficiencies of the Yamashita reference.

Applicant submits that the cited references, individually or in combination, do not teach nor disclose the combination of elements of claims 1-17 of the present invention. Specifically, neither Yamashita nor Smith teach or suggest the recited elements of **extracting a terminal sharing node and link by comparing the node and link**

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sequence with a map for terminal, reconstructing a path guidance data of the complex intersection based on **the extracted sharing node and link,** wherein a complex intersection is disclosed as an intersection having a plurality of nodes, as in amended claims 1 and 10. Therefore, for the reasons presented above, even if one skilled in the art were to combine the teachings of Yamashita and Smith in the manner asserted, claims 2, 9 and 11 would be patentable at least by virtue of their dependence upon patentable independent claims 1 or 10. Applicant request that the rejections under 35 U.S.C. § 103(a) are withdrawn and that the application is allowed.
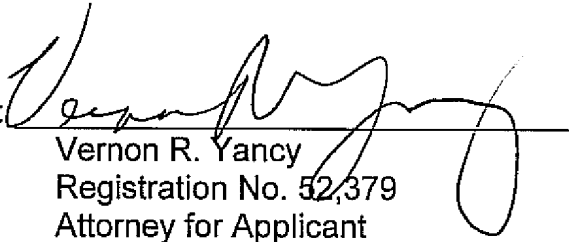
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Conclusion

In view of the foregoing, it is respectfully submitted that the application and the claims are in condition for reconsideration on the merits, thus reexamination of the application is requested. The Examiner is invited to call the undersigned attorney at (213) 623-2221 should the Examiner believe a telephone interview would advance the prosecution of the application.

Respectfully submitted,

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